

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) DEREK CARTER, and  
(2) KELLY ANDRADE,

Defendants

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20-cr-10110-DJC

**JOINT MOTION TO CONTINUE STATUS CONFERENCE**

The United States respectfully requests that the Court continue the Status Conference as to both defendants, currently set for January 25, 2022, until a date in March 2022, and exclude the time in the interests of justice. The undersigned has conferred with counsel for the defendants, who both join this motion.

As grounds, the government states that it is actively involved in plea discussions with both defendants. Defendant Andrade is continuing to review a draft plea agreement provided by the government, and the government is actively preparing a plea agreement for Defendant Carter's review. All parties continue to believe the cases will be resolved by plea. Counsel's ability to confer with their clients has been significantly limited during this most recent COVID surge. As a result, the parties respectfully request an additional 45 days to finalize plea negotiations and request that the Court continue the January 25, 2022 status conference to a date in March 2022.

January 19, 2022

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Lauren A. Graber  
Lauren A. Graber  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed today through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Lauren A. Graber

Lauren A. Graber

Assistant United States Attorney

January 19, 2022